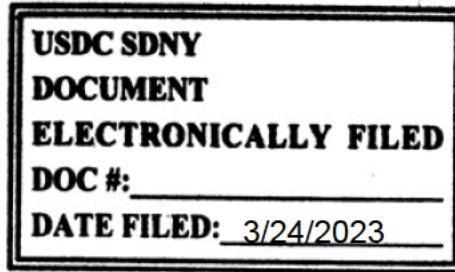


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March 23, 2023

VIA ECF

The Honorable Magistrate Judge Robert W. Lehrburger
United States District Court
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Re: *Rodriguez et al v. 673 J.R.V. Corp. et al*
Case No. 1:22-cv-05749 (LGS)

Dear Judge Lehrburger:

We represent Defendants 673 J.R.V. Corp., John LaCourte, and Lucilene Martins (collectively “Defendants”) in the above-captioned matter. We respectfully write on behalf of both parties to request a thirty-day extension of the deadline to complete mediation from April 9, 2023 to May 9, 2023. This request is being made because the parties and the assigned mediator have been unable to find a mutually agreeable date for a mediation session prior to April 9, 2023 and this requested extension will allow the parties to find a mutually agreeable date. The parties also respectfully request that the discovery deadlines in this case be stayed pending completion of mediation, or until May 9, 2023, whichever is earlier. This is the parties first requested extension of the deadline to complete mediation and no other deadlines not mentioned herein will be affected by this request.

Thank you for your consideration.

Respectfully Submitted,

/s/ Jeffrey A. Kimmel
Jeffrey A. Kimmel
Partner
For the Firm

cc: Plaintiffs’ attorney (via ECF)

SO ORDERED:

3/24/2023